

**THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT COURT OF DELAWARE**

THERESA CROTHER,	:	Civil Action No. 04-913 (KAJ)
GEORGE GREEN,	:	TRIAL BY JURY OF
	:	TWELVE DEMANDED
GREGORY PARISE,	:	
MICHAEL WHETSTONE,	:	
	:	
	v.	
TOWN OF DEWEY BEACH,	:	
	:	
SAMUEL MACKERT,	:	
Acting Chief	:	
Dewey Beach Police Department	:	
	:	
PATROLMAN ZACHARY PETTYJOHN,	:	
Dewey Beach Police Department	:	
	:	
PATROLMAN JOHN WHEATLEY,	:	
Dewey Beach Police Department	:	

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants, through their undersigned counsel, hereby move this Honorable Court to enter the attached Order, granting summary judgment in their favor and against plaintiffs and, in support thereof, aver as follows:

1. Defendants request this Honorable Court to grant summary judgment in their favor and against plaintiffs for the reasons set forth in their Memorandum of Points and Authorities in Support of Defendants' Motion for Summary Judgment.

**WHEREFORE**, defendants respectfully move this Honorable Court for entry of summary judgment in their favor and against plaintiffs.

MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN

BY: /s/ *Kevin J. Connors*  
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Attorney for Defendants

Dated: March 1, 2006  
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